

# **EXHIBIT 4**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

DONNA CURLING, ET AL., )  
)  
Plaintiffs, )  
)  
vs. ) CIVIL ACTION NO.  
)  
BRAD RAFFENSPERGER, ET ) 1:17-CV-2989-AT  
AL, )  
)  
Defendants. )

VIDEOTAPED 30(b)(6) DEPOSITION OF ERIC B. CHANEY  
(Taken by Plaintiffs)  
August 15, 2022  
10:20 a.m.

Reported by: Debra M. Druzisky, CCR-B-1848

1 A. I notified the commissioner when I moved.

2 Q. And that was a couple months ago?

3 A. Yes.

4 Q. Okay. And then when did you first hear  
5 from the commissioner that you needed to live in  
6 the district?

7 A. Friday.

8 Q. Okay. So you heard the same day and  
9 resigned that day?

10 A. That's correct.

11 Q. Who else is current -- well, strike that.  
12 Who is currently on the board right now  
13 for Coffee County?

14 A. Our chairperson is Ms. Ernestine  
15 Thomas-Clark. Co-chair I believe is either Wendell  
16 Stone or Matthew McCullough. I'm not 100 percent  
17 sure of that at this time.

18 Matthew McCullough is a board member,  
19 Wendell Stone is a board member, and Andy Thomas is  
20 a board member currently.

21 Q. Did you ever serve as chair?

22 A. No.

23 Q. Co-chair?

24 A. No.

25 Q. Did you ever have any position on the

1 board other than just a board member?

2 A. No.

3 Q. What were your responsibilities generally  
4 as a member of the Coffee County election board?

5 A. Just a board member.

6 Q. Right. But what does the Coffee County  
7 board do with respect to elections in the county?

8 A. The board basically is in charge of hiring  
9 the supervisor of elections and the assistant  
10 supervisor of elections and making sure they  
11 fulfill their duties and conduct elections and make  
12 sure that people are able to register to vote in  
13 Coffee County.

14 Q. Okay. And do I understand right that the  
15 elections supervisor and the assistant elections  
16 supervisor in Coffee County, they report to the  
17 board?

18 A. They do.

19 Q. Have you served on any other election  
20 boards?

21 A. No.

22 Q. Have you had any other official positions  
23 with respect to Georgia elections?

24 A. No.

25 Q. What did you do, if anything, to prepare

1 for the deposition today?

2 MR. DELK: And I'll instruct the  
3 witness, don't divulge anything that you  
4 and I discussed in our meetings.

5 THE REPORTER: I'm sorry. I don't  
6 know who was speaking.

7 MR. DELK: That was Stephen Delk.

8 THE REPORTER: Okay. Can you restate  
9 that, please?

10 MR. DELK: Sure. I was just  
11 instructing the witness to not divulge  
12 anything from my communications with him,  
13 because that would be privileged  
14 information.

15 But subject to that, you can respond.

16 BY MR. CROSS:

17 Q. So apart from talking with your counsel,  
18 what, if anything, did you do to prepare for today?

19 A. On the advice of counsel, I respectfully  
20 decline to answer on the basis of my rights and  
21 privilege under Article I, Section 1, Paragraph 16  
22 of the Georgia Constitution, the Fifth Amendment of  
23 the United States and Georgia law.

24 As the United States Supreme Court has  
25 stated, privilege against testifying protects

1 everyone, including innocent people, from answering  
2 questions if the truth might be used to help create  
3 a misleading impression that they were somehow  
4 involved in improper conduct.

5 So I hereby follow the advice of my  
6 counsel and respectfully decline to answer.

7 Q. You're taking the Fifth Amendment in  
8 response to a question of what you did to get ready  
9 for today?

10 A. Yes.

11 Q. Okay.

12 MR. CROSS: And Mr. Delk, just for  
13 ease, if he's going to take the Fifth in  
14 response to any other questions, if he  
15 just says Fifth Amendment.

16 MR. DELK: That's fine, as long as we  
17 stipulate that in -- by stating so, it  
18 encompasses the entirety of the statement.

19 MR. CROSS: Yes.

20 MR. DELK: That's agreeable.

21 MR. CROSS: Yeah. Okay. You tell  
22 me.

23 MR. DELK: Moving forward all you  
24 need to do is say "Fifth Amendment," and  
25 it saves you from having to read the whole

1 statement.

2 THE WITNESS: Yes.

3 MR. CROSS: Yeah.

4 (Whereupon, a discussion ensued  
5 off the record.)

6 BY MR. CROSS:

7 Q. All right. Let me hand you what's been  
8 mark -- what's going to be marked as Exhibit 1.

9 MR. CROSS: Mr. Delk, if you want to  
10 take a look at it, it's a copy of the  
11 document subpoena that we -- that my  
12 client served.

13 (Whereupon, Plaintiff's  
14 Exhibit 1 was marked for  
15 identification.)

16 BY MR. CROSS:

17 Q. And sorry, disregard that red X. I wasn't  
18 going to use that particular copy, but it's the  
19 only one we have. Otherwise, it's exactly the  
20 same.

21 A. Sure.

22 Q. But just tell me, do you recognize Exhibit  
23 1?

24 A. Yes.

25 Q. Okay. And so you recognize this as a

1 question. Can you --

2 Q. Sure.

3 A. -- rephrase that?

4 Q. You have been inside the Coffee County  
5 election office; right?

6 A. Yes.

7 Q. And was there ever a point where you were  
8 inside the Coffee County elections office in any  
9 capacity other than as a member of the board?

10 A. No.

11 Q. Just so I understand, when you're invoking  
12 the Fifth Amendment today, are you doing that on  
13 your personal behalf or on behalf of the Coffee  
14 County Board of Elections?

15 MR. DELK: Object to the form. You  
16 know that's not legally proper to do it on  
17 behalf of the board. And this deposition  
18 is noticed for individual, not a 30(b)(6),  
19 so I object to the entire format of that  
20 question being improper.

21 MR. CROSS: I mean, it seems like  
22 we're agreeing, but I just want to make  
23 sure that he's asserting the Fifth  
24 personally, not on behalf of the board.

25 MR. DELK: He's only providing



1 testimony personally.

2 MR. CROSS: Okay.

3 BY MR. CROSS:

4 Q. Do you disagree with your counsel?

5 A. I do not.

6 Q. Okay.

7 (Whereupon, Plaintiff's  
8 Exhibit 4 was marked for  
9 identification.)

10 BY MR. CROSS:

11 Q. So Mr. Chaney, I've handed you what's been  
12 marked as Exhibit 4. Just take a moment to read  
13 through it, and tell me if you recognize it.

14 (Whereupon, a discussion ensued  
15 off the record.)

16 (Whereupon, the document was  
17 reviewed by the witness.)

18 THE WITNESS: Yes, sir, I do.

19 BY MR. CROSS:

20 Q. And what do you recognize Exhibit 4 as?

21 A. It's just an investigation summary where  
22 there was a complaint -- or complaints filed I  
23 guess through the Secretary of State's office. And  
24 I see the findings and the potential violation on  
25 the back of the page.

1 Q. Okay. So Exhibit 4 is an official summary  
2 from the Secretary of State's office about an  
3 investigation involving Coffee County; is that  
4 fair?

5 A. Yes.

6 Q. And what involvement, if any, did you have  
7 with this investigation?

8 A. None that I recall.

9 Q. So did anybody from the State interview  
10 you as a member of the board?

11 A. Not that I recall.

12 Q. Did anyone from the State provide a report  
13 to any -- to you as a member of the board other  
14 than what's written here?

15 A. Not that I recall.

16 Q. Okay. So if we look at Exhibit 4, look at  
17 complaint two on Page 1. Do you see that?

18 A. I do.

19 Q. And it reads:

20 "A video surfaced on YouTube where  
21 it showed Coffee County election  
22 supervisor Misty Martin discussing the  
23 ways in which the election software  
24 could be manipulated."

25 Do you see that?

1 A. I do.

2 Q. And Misty Martin is the same person as  
3 Misty Hampton?

4 A. Yes.

5 Q. Okay. So we're talking about the, at this  
6 time, the Coffee County election supervisor; right?

7 A. Yes.

8 Q. Okay. And are you familiar with that  
9 YouTube video?

10 A. Yes.

11 Q. You filmed that video; right?

12 A. Fifth Amendment.

13 Q. The video that's referenced there, that  
14 was filmed during an official meeting of the Coffee  
15 County election board in the Coffee County  
16 office -- election office; right?

17 A. Fifth Amendment.

18 Q. All right. Turn to the third page, if you  
19 would. Do you see where it has Findings at the  
20 top?

21 A. Yes, sir.

22 Q. And then Complaint Two referencing that  
23 same complaint. Do you see that?

24 A. Yes.

25 Q. And under the findings here, the State

1 reports:

2 "Ms. Martin, along with Coffee  
3 County Board of Election member Eric  
4 Chaney, made two videos claiming the  
5 Dominion system election software  
6 could be manipulated."

7 Do you see that?

8 A. I do.

9 Q. Do you disa -- dispute that finding?

10 A. Fifth Amendment.

11 Q. It then goes on, if you come to the third  
12 sentence, four lines down in the middle, do you see  
13 where it reads, "Ms. Martin never"?

14 A. I do.

15 Q. And it -- and the finding here is:

16 "Ms. Martin never once during the  
17 videos explained the intended use of  
18 the adjudication process.

19 "The video was very misleading and  
20 seemed its purpose was simply to  
21 create doubt and public mistrust in  
22 the Dominion Voting System."

23 Do you see that?

24 A. Yes.

25 Q. Was it your purpose in creating this video

1 to create doubt and public mistrust in the Dominion  
2 Voting System?

3 MR. DELK: Object to the form.

4 THE WITNESS: Fifth Amendment.

5 BY MR. CROSS:

6 Q. What was the purpose of the video?

7 A. Fifth Amendment.

8 Q. As you sit here, do you have any reason to  
9 believe creating the video was criminal?

10 A. Fifth Amendment.

11 Q. Do you believe that video being released  
12 to the public was criminal?

13 A. Fifth Amendment.

14 Q. If you come down to the second paragraph,  
15 do you see where there's discussion of a password  
16 that was taped to the bottom of the computer screen  
17 Ms. Martin was using?

18 A. Yes.

19 (Whereupon, a discussion ensued  
20 off the record.)

21 (Whereupon, Plaintiff's  
22 Exhibit 5 was marked for  
23 identification.)

24 BY MR. CROSS:

25 Q. I'll hand you Exhibit 5. And just tell me

1 E-mail, do you see the sentence that begins "I have  
2 no knowledge whether"?

3 A. I do.

4 Q. And you wrote to Ms. Herzog:

5 "I have no knowledge whether or  
6 not Misty allowed anyone without  
7 authorization to access the server  
8 room (which remains locked). And  
9 because of the layout of the elections  
10 office, which is very small, you have  
11 to walk through Misty's office to  
12 access that room.

13 "Therefore, it is highly unlikely,  
14 if not impossible, for her not to know  
15 who did or did not enter the server  
16 room."

17 Do you see that?

18 A. Yes.

19 Q. You then go on:

20 "I have no personal knowledge that  
21 anyone without authorization accessed  
22 the server room..."

23 Do you see that?

24 A. Yes.

25 Q. That was a lie; right?

1 MR. DELK: Object to the form.

2 THE WITNESS: No.

3 BY MR. CROSS:

4 Q. So that's a true statement, that you have  
5 no personal knowledge that anyone without  
6 authorization accessed the server room?

7 A. Fifth Amendment.

8 Q. Well, is it a lie or is it a true  
9 statement?

10 A. Fifth Amendment.

11 Q. Well, you just said it's not a lie.

12 A. Fifth Amendment.

13 Q. Okay. And you go on in that same sentence  
14 to say that you also have no "knowledge of any  
15 other statements or allegations in Ms. Brown's  
16 letter."

17 Do you see that?

18 A. That's correct.

19 Q. That also was a lie; right?

20 A. Fifth Amendment.

21 MR. DELK: Object to the form.

22 BY MR. CROSS:

23 Q. And you wrote this E-mail specifically for  
24 the purpose of Ms. Herzog providing it as the  
25 response to the Washington Post inquiry; right?

1           A.     Correct.

2           Q.     Did you convey the truth of what happened  
3     to your counsel or did you lie to your counsel,  
4     too?

5                     MR. DELK:   Object to the form.

6                     That's privileged.

7                     THE WITNESS:   Fifth Amendment.

8     BY MR. CROSS:

9           Q.     Why did you write this dishonest E-mail in  
10    response to the inquiry from the Washington Post?

11                    MR. DELK:   Object to the form.   Asked  
12    and answered.

13                    THE WITNESS:   Fifth Amendment.

14    BY MR. CROSS:

15           Q.     In the days leading up to January 7 of  
16    2021, you reached out to Misty Hampton and asked if  
17    she'd be willing to work with folks to get access  
18    to the voting equipment in her elections office;  
19    right?

20                    MR. DELK:   Object to the form.

21                    THE WITNESS:   Fifth Amendment.

22    BY MR. CROSS:

23           Q.     You had multiple conversations with her  
24    about that; right?

25           A.     Fifth Amendment.



1 Q. You told her specifically that one of  
2 those individuals would be a man named Scott Hall;  
3 right?

4 A. Fifth Amendment.

5 Q. Cathy Latham was one of the key  
6 individuals who helped organized this with Scott  
7 Hall; right?

8 A. Fifth Amendment.

9 Q. You and Ms. Latham worked together to  
10 organize this; correct?

11 A. Fifth Amendment.

12 Q. On the morning of January 7, 2021, you  
13 were aware that Scott Hall and others arrived in  
14 the Coffee County election office specifically for  
15 the purpose of copying ballots and copying data  
16 from the voting equipment; right?

17 A. Fifth Amendment.

18 Q. Did you send any text messages about that?

19 A. Fifth Amendment.

20 Q. Do you use Signal?

21 A. Fifth Amendment.

22 Q. It's incriminating whether you use Signal  
23 at all?

24 A. Fifth Amendment.

25 Q. I take it you use Signal only to commit

1 crimes?

2 A. Fifth Amendment.

3 MR. DELK: Object to the form.

4 BY MR. CROSS:

5 Q. You were in the Coffee County elections  
6 office on January 7, 2021 yourself; right?

7 A. Yes.

8 Q. Ms. Latham was also there; right?

9 A. Fifth Amendment.

10 Q. You were there when Scott Hall walked into  
11 the door; right?

12 A. Fifth Amendment.

13 (Whereupon, Plaintiff's  
14 Exhibit 9 was marked for  
15 identification.)

16 BY MR. CROSS:

17 Q. All right. Mr. Chaney, I've handed you  
18 what's been marked as Exhibit 9. Take a moment to  
19 read through it. But do you recognize that these  
20 are text messages that you exchanged with Misty  
21 Hampton?

22 (Whereupon, the document was  
23 reviewed by the witness.)

24 THE WITNESS: I recognize this as a  
25 text thread, but I'm not -- I mean, I

1           can't testify to them.

2       BY MR. CROSS:

3           Q.     Text thread with Misty Hampton?

4           A.     Fifth Amendment.

5           Q.     All right. Do you see at the bottom  
6       there's pagination 24 pages, if you look on the  
7       bottom right corner?

8           A.     Yes, sir.

9           Q.     Go to Page 12 of 24 in the text thread  
10       with Ms. Hampton. You see the date November 12th,  
11       2020 --

12          A.     Yes.

13          Q.     -- 10:08 p.m.?

14                 And she wrote to you:

15                 "Did you like that post? Was that  
16       okay?"

17                 You said: "I did. Very good."

18                 She writes: "Thank you."

19                 Do you see that?

20          A.     I do.

21          Q.     Do you recall what this was about, what  
22       this post was about?

23          A.     Fifth Amendment.

24          Q.     Okay. And then you write back:

25                 "Thanks for your hard work."

1 County.

2 Q. And you're aware that, during at least one  
3 election, Ms. Hampton's daughter was able to use a  
4 poll pad to watch Netflix during the election;  
5 right? Ms. Hampton conveyed that to you?

6 A. Fifth Amendment.

7 Q. Then if you come down to the bottom,  
8 there's still -- just so you can see, we're still  
9 on December 30 of 2020. That spills over to the  
10 top of Page 20, and there's an additional photo.

11 So this is still December 30. Do you see  
12 that?

13 A. Yes.

14 Q. And there's a card game that's depicted on  
15 a computer screen in that one; right?

16 A. Yes.

17 Q. And here Ms. Hampton wrote to you:

18 "This is the computer that the  
19 I.C.C. scanner is connected to."

20 Right?

21 MR. DELK: Object to the form.

22 THE WITNESS: Fifth Amendment.

23 BY MR. CROSS:

24 Q. And then she sends you another photo. Do  
25 you see that below?

1 A. Yes.

2 Q. And there she writes:

3 "This is the E.M.S. server  
4 computer."

5 Do you see that?

6 A. Fifth Amendment.

7 Q. Then on December 31 of 2020 at 7:46 p.m.,  
8 you wrote to her:

9 "Did you get the letter sent?"

10 Do you see that?

11 A. Yes.

12 Q. What letter?

13 A. Fifth Amendment.

14 Q. Sent to whom?

15 A. Fifth Amendment.

16 Q. About what?

17 A. Fifth Amendment.

18 Q. For what purpose?

19 A. Fifth Amendment.

20 Q. Who wrote it?

21 A. Fifth Amendment.

22 Q. What was your involvement?

23 A. Fifth Amendment.

24 Q. Who else was involved?

25 A. Fifth Amendment.

1 Q. She responds to you:

2 "No. I am going to finish it  
3 tomorrow."

4 Do you see that?

5 A. I do.

6 Q. And then you responded with an E-mail  
7 address for Preston Haliburton. Do you see that?

8 A. I do.

9 Q. Why did you give her Preston Haliburton's  
10 E-mail address?

11 A. Fifth Amendment.

12 Q. Okay. Are you aware that Mr. Haliburton  
13 represents Cathy Latham?

14 A. Fifth Amendment.

15 Q. All right. Come to Page 22 of 24. If you  
16 come down in the middle, do you see there's a text  
17 January 6th of 2021 at 4:26 p.m.?

18 A. I do.

19 Q. And on that day, Ms. Hampton wrote to you:

20 "Scott Hall is on the phone with  
21 Cathy about wanting to come scan our  
22 ballots from the general election like  
23 we talked about the other day. I am  
24 going to call you in a few."

25 Do you see that?

1 A. I do.

2 Q. "Cathy" refers to Cathy Latham; right?

3 A. Fifth Amendment.

4 Q. So you were aware, at least as of January  
5 6th of 2021, that Scott Hall was coming in to the  
6 Coffee County election office at least to access a  
7 copy, to scan ballots; right?

8 A. Fifth Amendment.

9 Q. So when you testified earlier that your  
10 only familiarity with Scott Hall was through an  
11 open records request, that was a lie; right, sir?

12 MR. DELK: Object to the form.

13 THE WITNESS: Fifth Amendment.

14 BY MR. CROSS:

15 Q. Are you aware that lying under oath is a  
16 felony?

17 A. Fifth Amendment.

18 Q. Do you know who Javier represents?

19 A. I do.

20 Q. The Secretary of State's office; right?

21 A. I do.

22 Q. Do you understand the Secretary of State's  
23 office has a lawyer sitting in this room in which  
24 you just lied?

25 MR. DELK: Object to the form.

1 BY MR. CROSS:

2 Q. Right?

3 A. Fifth Amendment.

4 Q. She then writes back later that same day,  
5 8:54 p.m.:

6 "I found out tonight that there is  
7 another way to change the ballots in  
8 R.T.R."

9 Do you see that?

10 A. I do.

11 Q. What's R.T.R.?

12 A. I don't know.

13 Q. And you write back: "What?"

14 She writes: "Yelp."

15 You say: "How?"

16 She says: "I found a manual on Dominion."

17 And then you say: "Wow."

18 Do you see that?

19 MR. DELK: Object to the form.

20 THE WITNESS: I do.

21 BY MR. CROSS:

22 Q. What was this other way to change ballots?

23 A. I'm not sure.

24 Q. Then on January 7, 2021, 10:18 a.m., she  
25 writes to you:



1           "Hey, are you coming to the  
2           office? I need a board member to be  
3           here when we transfer ballots."

4           Do you see that?

5           A. I do.

6           Q. Why did a board member need to be there to  
7           transfer ballots?

8           A. Fifth Amendment.

9           Q. And by "transfer ballots," she's talking  
10          about copying the ballots for Scott Hall and  
11          others; right?

12          MR. DELK: Object to the form.

13          THE WITNESS: Fifth Amendment.

14          BY MR. CROSS:

15          Q. And you wrote:

16                "I'll be there at 11:00."

17          Right?

18          A. I did.

19          Q. And you don't dispute that you were in the  
20          Coffee County election office on January 7, 2021;  
21          right?

22          A. Fifth Amendment.

23          Q. And when you were in the office that day,  
24          you saw Scott Hall come in with others right?

25          A. Fifth Amendment.

1 Q. And you don't dispute that Ms. Latham was  
2 in the office that day; right?

3 A. Fifth Amendment.

4 (Whereupon, Ms. Curling joined the  
5 deposition.)

6 BY MR. CROSS:

7 Q. You don't dispute that Jil Riddlehoover was  
8 in the office that day; right?

9 A. Fifth Amendment.

10 Q. If you come to the top of the next page,  
11 January 7 of 2021 at 7:24 p.m., you send a phone  
12 number to Ms. Hampton.

13 Do you see that?

14 A. I do.

15 Q. Whose phone number is that?

16 A. I don't know.

17 Q. Why did you send her that number?

18 A. I don't know.

19 Q. Nothing you can tell me about that phone  
20 number?

21 A. Fifth Amendment.

22 Q. That phone number is for Robert Sinners,  
23 S-I-N-N-E-R-S; right?

24 A. I'm not sure.

25 Q. You sent a phone number to Ms. Hampton on

1 January 7, 2021 and you have no idea whose number  
2 it is?

3 A. Fifth Amendment.

4 Q. I'm going to ask you again, Mr. Chaney.  
5 You are aware that that phone number is registered  
6 to Robert Sinners; right?

7 A. Fifth Amendment.

8 MR. DELK: Object to the form.

9 BY MR. CROSS:

10 Q. What was Mr. Sinners' involvement in a  
11 team coming into the Coffee County elections office  
12 on January 7, 2021 to copy ballots and copy  
13 proprietary data off of the Dominion voting  
14 equipment?

15 MR. DELK: Object to the form.

16 THE WITNESS: Fifth Amendment.

17 BY MR. CROSS:

18 Q. Did you personally communicate with  
19 Mr. Sinners?

20 A. Fifth Amendment.

21 Q. Were you asking Ms. Hampton to communicate  
22 with Mr. Sinners about those events?

23 A. Fifth Amendment.

24 Q. Who in the Secretary of State's office to  
25 your knowledge was aware of what happened on

1 January 7th, 2021 involving Mr. Hall and Mr. Maggio  
2 and others?

3 A. Fifth Amendment.

4 MR. DELK: Object to the form.

5 BY MR. CROSS:

6 Q. When did they become aware?

7 A. Fifth Amendment.

8 Q. Immediately after you send her this phone  
9 number, you write to her:

10 "Let's switch to Signal."

11 Right?

12 A. Fifth Amendment.

13 Q. Well, it's written here in front of us. I  
14 mean, we can get that much right. You wrote to  
15 her:

16 "Let's switch to Signal."

17 Right?

18 MR. DELK: Object to the form. Asked  
19 and answered.

20 THE WITNESS: Fifth Amendment.

21 BY MR. CROSS:

22 Q. You wanted to switch to Signal because you  
23 wanted to make sure you could delete the messages  
24 you guys were exchanging; right?

25 A. Fifth Amendment.

1 Q. Maybe if you'd thought of that sooner, we  
2 wouldn't have all these texts, would we?

3 A. Fifth Amendment.

4 MR. DELK: Object to the form.

5 BY MR. CROSS:

6 Q. Thought of it a little bit too late.

7 MR. DELK: Argumentative.

8 Don't -- you don't have to respond.

9 That's not even a question.

10 BY MR. CROSS:

11 Q. I gathered from going through the document  
12 requests earlier where you wrote "denied" that you  
13 have no responsive Signal messages to produce to  
14 us; is that right?

15 A. Fifth Amendment.

16 Q. In fact, you've recently told people  
17 associated with the Coffee County board that you  
18 deleted those messages; right?

19 MR. DELK: Object to the form.

20 THE WITNESS: Fifth Amendment.

21 BY MR. CROSS:

22 Q. On January 8th of 2021 at 11:52 a.m., she  
23 writes to you:

24 "Did you check Signal?"

25 Right?

## C E R T I F I C A T E

UNITED STATES OF AMERICA

NORTHERN DISTRICT OF GEORGIA

I, SHANNON R. WELCH, RMR, CRR, Official Court Reporter of the United States District Court, for the Northern District of Georgia, Atlanta Division, do hereby certify that the foregoing 264 pages constitute a true transcript of proceedings had before the said Court, held in the City of Atlanta, Georgia, in the matter therein stated.

In testimony whereof, I hereunto set my hand on this, the 16th day of January, 2024.



---

SHANNON R. WELCH, RMR, CRR  
OFFICIAL COURT REPORTER  
UNITED STATES DISTRICT COURT

UNITED STATES DISTRICT COURT  
OFFICIAL CERTIFIED TRANSCRIPT